

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	:	Case No. 16-51181
	:	Chapter
STEVEN D. BLUNT	:	
CANDACE A. BLUNT	:	Judge Preston

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State of Ohio, Department of Job and Family Services	:	
	:	
	:	
Plaintiff,	:	
	:	
vs.	:	Adv. Pro. No. 16-ap-02101
	:	
Steven D. Blunt	:	
	:	
	:	
Defendant.	:	

**MOTION FOR DEFAULT JUDGMENT**

Now comes Attorney General Mike DeWine, acting through counsel duly appointed as provided in Ohio Revised Code Section 109.08, on behalf of the Plaintiff Ohio Department of Job and Family Services (“ODJFS”) and moves this Court pursuant to Rule 7055 of the Federal Rules of Bankruptcy Procedure for judgment by default against Defendant, Steven D. Blunt, as Defendant has failed to answer or otherwise plead in response to the Complaint of ODJFS. A Memorandum supporting Plaintiff’s Motion is attached hereto.

Respectfully submitted,

/s/ Erin M. Dooley  
\_\_\_\_\_  
Charles A. Mifsud (0070498)  
Special Counsel to the Attorney General  
Erin M. Dooley (0089092)  
THE LAW OFFICE OF CHARLES MIFSUD, LLC  
6305 Emerald Parkway  
Dublin, Ohio 43016  
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Attorneys for Plaintiff

**MEMORANDUM IN SUPPORT**

ODJFS filed its complaint in this matter on June 6, 2016. Also on June 6, 2016, service was made on Defendant pursuant to Fed. R. Bankr. P. 7004(b)(1), and a copy of the summons and complaint in this matter was served on Defendant's counsel as required by Fed. R. Bankr. P. 7004(g). An affidavit as to Defendant's status is attached hereto as Exhibit A. To date, Defendant has failed to answer, appear or otherwise plead as required by Fed R. Bank. P. 7012. See, Exhibit B.

Attached hereto as Exhibit C is a Finding and Determination issued by ODJFS to Defendant showing that there is due from Defendant the amount of \$13,005.00 in fraudulently overpaid benefits, plus interest through March 31, 2016 in the amount of \$2,869.41. Pursuant to R.C. 4141.35(A)(3) and R.C. 4141.27, this Finding and Determination is prima facie evidence of the amount due and owing from Defendant. Attached hereto as Exhibit D is an affidavit testifying as to the accuracy of that information and the current amount due. ODJFS is entitled to continuing interest on this principal amount from April 1, 2016 as provided in R.C. 4141.23(B). Moreover, Defendant is not entitled to a discharge of this debt pursuant to 11 U.S.C. 523(a)(2)(A) and 523(a)(6).

WHEREFORE, Plaintiff, Ohio Department of Job and Family Services, moves this Court to enter judgment in its favor against Defendant, Steven D. Blunt, in the amount of \$15, 874.41 plus continuing interest from April 1, 2016 as provided in Ohio Revised Code 4141.23(B) and court costs and to hold that this amount is not subject to discharge pursuant to 11 U.S.C. 523(a)(2)(A) and 523(a)(6).

Respectfully submitted,

/s/ Erin M. Dooley

Charles A. Mifsud (0070498)

Special Counsel to the Attorney General

Erin M. Dooley (0089092)

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Attorneys for Plaintiff State of Ohio,

Dept. of Job and Family Services

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	:	Case No. 16-51181
	:	Chapter 7
STEVEN D. BLUNT	:	
CANDACE A. BLUNT	:	Judge Preston

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State of Ohio, Department of Job  
and Family Services

Plaintiff,

vs.

Steven D. Blunt,

Defendant.

Adv. Pro. No. 16-ap-02101

**NOTICE OF MOTION FOR DEFAULT JUDGMENT**

The Ohio Department of Job and Family Services has filed papers with the Court moving for Default Judgment in this matter.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.**

If you do not want the Court to grant a Default Judgment, or if you want the Court to consider your views on the Motion, then on or before **twenty-one (21) days from the date set forth in the certificate of service for the motion**, you must file with the Court a written response at the United States Bankruptcy Court for the Southern District of Ohio, 170 North High Street, Columbus, OH 43215 or your attorney must file a response using the court's ECF system. If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above. You must also mail a copy to the attorney for the Ohio Department of Job and Family Services at the following address:

Erin M. Dooley  
The Law Office of Charles Mifsud, LLC  
6305 Emerald Parkway  
Dublin, Ohio 43016

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting the Motion.

Date: July 7, 2016

Respectfully submitted,

/s/ Erin M. Dooley  
Charles A. Mifsud (0070498)  
Special Counsel to the Attorney General  
Erin M. Dooley (0089092)  
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Attorneys for Plaintiff State of Ohio,  
Dept. of Job and Family Services

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been served upon the following by regular United States mail, postage prepaid, this 7<sup>th</sup> day of July 2016:

Steven D. Blunt  
769 Grayfeather Dr.  
Blacklick, OH 43004

/s/ Erin M. Dooley

Erin M. Dooley (0089092)